

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETSOCKET, INC.,

Plaintiff,

v.

CISCO SYSTEMS, INC.,

Defendant.

Case No. 2:22-cv-00172-JRG

JURY TRIAL DEMANDED

**DECLARATION OF ODED BURGER IN SUPPORT OF PLAINTIFF NETSOCKET,
INC.'S MOTION TO COMPEL DISCOVERY**

I, Oded Burger, hereby declare as follows:

1. I am a partner with the firm Daignault Iyer LLP, counsel of record for Plaintiff Netsocket, Inc. I submit this Declaration in support of Plaintiff Netsocket, Inc.'s Motion to Compel Discovery.

2. I make this declaration on the basis of personal knowledge, and if called to testify as a witness, I would and could testify competently here.

3. Attached as Exhibit A is a true and correct copy of Cisco DNA Center User Guide, Release 2.3.3. Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

4. Attached as Exhibit B is a true and correct copy of the following a paloaltonnetworks.com webpage, last visited on November 13, 2023.

5. Attached as Exhibit C is a true and correct copy of Plaintiff Netsocket, Inc.'s Infringement Contentions, served on September 8, 2022.

6. Attached as Exhibit D is a true and correct copy of Plaintiff Netsocket, Inc.'s Infringement Claim Chart regarding U.S. Patent No. 7,827,284. Relevant portions have been highlighted.

7. Attached as Exhibit E is a true and correct copy of Plaintiff Netsocket, Inc.'s Infringement Claim Chart regarding U.S. Patent No. 7,720,966. Relevant portions have been highlighted.

8. Attached as Exhibit F is a true and correct copy of Plaintiff Netsocket, Inc.'s Infringement Claim Chart regarding U.S. Patent No. 7,606,885. Relevant portions have been highlighted.

9. Attached as Exhibit G is a true and correct copy of Plaintiff Netsocket, Inc.'s Infringement Claim Chart regarding U.S. Patent No. 7,885,286. Relevant portions have been highlighted.

10. Attached as Exhibit H is a true and correct copy of Plaintiff Netsocket, Inc.'s Infringement Claim Chart regarding U.S. Patent No. 7,734,796. Relevant portions have been highlighted.

11. Attached as Exhibit I is a true and correct copy of an April 12, 2023 letter composed by Netsocket's counsel and sent to Cisco's counsel. Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

12. Attached as Exhibit J is a true and correct copy of Netsocket, Inc.'s First Set of Interrogatories (Nos. 1-6). Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

13. Attached as Exhibit K is a true and correct copy of Defendant Cisco Systems, inc.'s Objections and Responses to Netsocket, Inc's First Set of Interrogatories (Nos. 1-6). Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

14. Attached as Exhibit L is a true and correct copy of a July 17, 2023 email composed by Netsocket's counsel and sent to Cisco's counsel. Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

15. Attached as Exhibit M is a true and correct copy of a July 24, 2023 email composed by Netsocket's counsel and sent to Cisco's counsel. Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

16. Attached as Exhibit N is a true and correct copy of September 7, 2023 email composed by Netsocket's counsel and sent to Cisco's counsel. Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

17. Attached as Exhibit O is a true and correct copy of a September 15, 2023 letter composed by Cisco's counsel and sent to Netsocket's counsel. Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

18. Attached as Exhibit P is a true and correct copy of GGSN Administration Guide, StarOS Release 21.27. Pursuant to the Local Rules of the United States District Court for the

Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

19. Attached as Exhibit Q is a true and correct copy of Plaintiff Netsocket, Inc.'s First Supplemental Responses and Objections to Defendant Cisco Systems, Inc.'s First Set of Interrogatories (Nos. 1-24). Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

20. Attached as Exhibit R is a true and correct copy of Cisco SD-Access | SD-WAN Independent Domain Pairwise Integration Prescriptive Deployment Guide. Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

21. Attached as Exhibit S is a true and correct copy of a Cisco APIC and QoS guide. Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

22. Attached as Exhibit T is a true and correct copy of Cisco Meraki Voice-over-IP Deployment Guide. Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

23. Attached as Exhibit U is a true and correct copy of a Cisco Catalyst SD-WAN Forwarding and QoS Configuration Guide, Cisco IOS XE Catalyst SD-WAN Release 17.x. Pursuant to the Local Rules of the United States District Court for the Eastern District of Texas, only relevant portions of the document have been included and highlighted for convenience.

24. Attached as Exhibit V is a true and correct copy of U.S. Patent No. 7,734,796.

25. Attached as Exhibit W is a true and correct copy of U.S. Patent No. 7,734,796.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated: November 14, 2023

/s/ Oded Burger
Oded Burger